

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>LISA ALYN,</b>	)	
	)	
<b>Plaintiff/Counter-Defendant,</b>	)	
	)	<b>Case No. 3:15-cv-00596</b>
	)	<b>District Judge Waverly D. Crenshaw, Jr.</b>
<b>v.</b>	)	<b>Magistrate Judge John S. Bryant</b>
	)	<b>JURY DEMAND</b>
<b>SOUTHERN LAND COMPANY, LLC,</b>	)	
	)	
<b>Defendant/Counter-Plaintiff.</b>	)	
_____	)	

**SOUTHERN LAND COMPANY, LLC’S MOTION FOR LEAVE TO FILE  
OMNIBUS MOTION TO EXCLUDE MS. ALYN’S PROFFERED EXPERT  
TESTIMONY UNDER SEAL**

Pursuant to ¶¶ 10 and 19 of the Stipulated Protective Order (Doc. No. 61, pp. 9-10), as well as § 5.07 of the Administrative Practices and Procedures for Electronic Case Filing, Defendant / Counter-Plaintiff Southern Land Company, LLC respectfully requests leave of Court to file its Omnibus Motion to Exclude Ms. Alyn’s Proffered Expert Testimony and Exhibits in support under seal because they refer to information designated by Ms. Alyn as “attorney’s eyes only” under the Stipulated Protective Order.

Respectfully submitted,

s/Randy Michels

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### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on August 26, 2016, a true and exact copy of the foregoing has been served via the Electronic Case Filing System of the United States District Court for the Middle District of Tennessee, which will automatically send email notification of such filing to the following attorneys of record:

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